

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ANGELA LYNNE MARTIN,	:	
Individually and as Administratrix of	:	
the Estate of Howard Edward Martin, Jr.,	:	
Plaintiff	:	
	:	NO. 4:15-CV-02034-MWB
v.	:	
	:	
NORFOLK SOUTHERN CORPORATION	:	
doing business as Norfolk Southern	:	COMPLAINT FILED 10/19/15
Railway Corporation, TODD MICHAEL	:	
BUBNIS, JAMES ERNEST MOFFETT,	:	
CLINTON TOWNSHIP, and LYCOMING	:	
COUNTY,	:	JURY TRIAL DEMANDED
Defendants	:	

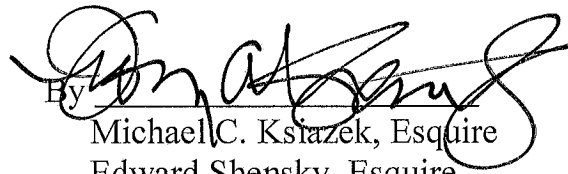
STIPULATION OF COUNSEL

AND NOW, come the parties, by and through their respective counsel, and stipulate as follows:

1. The above-captioned action is dismissed in its entirety, without prejudice, as to defendant Lycoming County, only.
2. If discovery should reveal facts inconsistent with the Affidavit of Mark Murawski, said defendant is subject to rejoinder, but only with leave of Court after written notice to said defendant and only upon cause shown.

3. Defendant Lycoming County retains the right to file any and all objections and/or opposition it might have to such a motion and/or claim; except, however, in consideration of the within voluntary dismissal, defendant Lycoming County will not raise the statute of limitations as a defense to any claim that was brought in plaintiff's original complaint.

STARK & STARK

By 
Michael C. Ksiazek, Esquire
Edward Shensky, Esquire
Jeffrey A. Krawitz, Esquire
Attorneys for Plaintiff

Date: _____

NAUMAN, SMITH, SHISSLER
& HALL, LLP

By _____
Craig J. Staudenmaier, Esquire
Joshua D. Bonn, Esquire
Attorneys for Defendants
Norfolk Southern Corporation,
Todd Michael Bubnis and
James Ernest Moffett

Date: _____

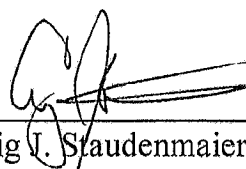
3. Defendant Lycoming County retains the right to file any and all objections and/or opposition it might have to such a motion and/or claim; except, however, in consideration of the within voluntary dismissal, defendant Lycoming County will not raise the statute of limitations as a defense to any claim that was brought in plaintiff's original complaint.

STARK & STARK

By _____
Michael C. Ksiazek, Esquire
Edward Shensky, Esquire
Jeffrey A. Krawitz, Esquire
Attorneys for Plaintiff

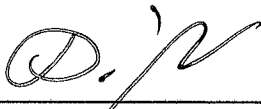
Date: _____

NAUMAN, SMITH, SHISSLER
& HALL, LLP

By  _____
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Norfolk Southern Corporation,
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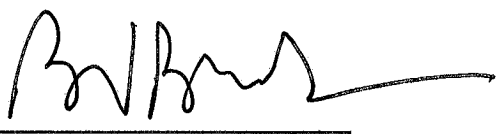
Date: 1 / 15 / 16

THE MACMAIN LAW GROUP, LLC

By 
David J. MacMain, Esquire
Attorney for Defendant
Clinton Township

Date: 1/7/15

McCORMICK LAW FIRM

By 
Brian J. Bluth, Esquire
PA I.D. 87432
Attorney for Defendant
Lycoming County

Date: 1/19/2016